

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

VS.

ALEXANDER (“ALEX”) E. JONES, *et al.*,

Defendants.

Case No. 3:18-cv-00017-NKM

DECLARATION OF
DEFENDANT ALLEN B. WEST
PURSUANT TO 28 U.S.C. § 1746

Pursuant to 28 U.S.C. § 1746, Allen B. West hereby declares as follows:

1. My name is Allen B. West, and I am one of the defendants named in this lawsuit. I am over eighteen years of age and competent to testify to the matters described herein. All of the statements made in this declaration are true and accurate to the best of my knowledge, information, and belief.
2. I am a veteran of the United States Army, having retired with the rank of Lieutenant Colonel. I am also a former member of the United States House of Representatives for Florida's 22nd Congressional District.
3. I now am a domiciliary and resident of Dallas, Dallas County, Texas, where I have lived since 2015.
4. I do not maintain any form of residence in the Commonwealth of Virginia.
5. I do not maintain or operate any business office or similar facility in the Commonwealth of Virginia.
6. I was not involved with any decision to publish or republish the article entitled *BOMBSHELL: New evidence suggests Charlottesville was a complete SET-UP*, which article is described in plaintiff's amended complaint, nor did I author or contribute to this

Ex. A

article in any way.

7. The domains AllenBWest.com and AllenWest.com that are placed at issue in this case were purchased and operated by Words-N-Ideas, LLC, and an individual named Michele Hickford. Though I had granted Ms. Hickford permission to operate a website bearing my name, I possessed no ownership interest in either domain and had no involvement with operating the website. Similarly, Ms. Hickford had my permission to manage my Facebook and Twitter accounts, but I only recovered control over those accounts after this suit was filed.
8. Furthermore, the individual identified as Derrick Wilburn is not and has never been my employee or agent.
9. It would be extremely burdensome, costly, and inconvenient for me to defend against this lawsuit in the Commonwealth of Virginia.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 22, 2018.

Lieutenant Colonel Allen B. West
ALLEN B. WEST (USA, Ret)